

Marc V. Kalagian  
Attorney at Law: 4460  
Law Offices of Rohlfing & Kalagian, LLP  
211 East Ocean Boulevard, Suite 420  
Long Beach, CA 90802  
Tel.: 562-437-7006  
Fax: (562)432-2935  
E-mail rohlfig.kalagian@rksslaw.com

Attorneys for Plaintiff  
Jose E. Flores

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JOSE E. FLORES,

Plaintiff,

vs.

CAROLYN W. COLVIN, Acting  
Commissioner of Social Security,

Defendant.

) Case No.: 2:14-cv-00806-JCM-GWF  
)  
) PLAINTIFF'S UNOPPOSED MOTION  
) FOR EXTENSION OF TIME TO FILE  
) HIS MOTION FOR REVERSAL  
) AND/OR REMAND

TO DEFENDANT MICHAEL J. ASTRUE, AS THE COMMISSIONER OF  
SOCIAL SECURITY, AND TO HIS ATTORNEYS OF RECORD:

Plaintiff Jose E. Flores, by and through his attorneys of record, respectfully  
requests an extension of time to and including September 26, 2014, in which to file  
his motion for reversal and/or remand. Marc V. Kalagian requires additional time  
to allow him to properly research the issues to prepare the motion for reversal  
and/or remand or otherwise plead.

This request is being filed as a motion because due to the press of business  
and vacation scheduling the attached Stipulation to Extend Time did not get filed

1 on time. Plaintiff's Counsel contacted Jean M. Turk, counsel of record for  
2 defendant, and Ms. Turk does not oppose this motion.

3 DATE: September 5, 2014      Respectfully submitted,

4                                      LAW OFFICES OF  
5                                      ROHLFING & KALAGIAN, LLP

6    /s/ *Marc V. Kalagian*

7 BY: \_\_\_\_\_  
8                                      Marc V. Kalagian  
9                                      Attorney for plaintiff Jimmy Gregory

**CERTIFICATE OF SERVICE  
FOR CASE NUMBER 2:14-CV-00806-JCM-GWF**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on September 5, 2014.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

*/s/ Marc V. Kalagian*

---

Marc V. Kalagian  
Attorneys for Plaintiff-Appellant

Marc V. Kalagian  
Attorney at Law: 4460  
211 East Ocean Boulevard, Suite 420  
Long Beach, CA 90802  
Tel: (562)437-7006  
Fax: (562)432-2935  
E-Mail: rohlfig.kalagian@rksslaw.com  
Attorneys for Plaintiff  
JOSE E. FLORES

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JOSE E. FLORES,	)	Case No.: 2:14-cv-00806-JCM-GWF
	)	
Plaintiff,	)	STIPULATION TO EXTEND TIME
v.	)	TO FILE MOTION FOR REMAND
	)	AND/OR REVERSAL
CAROLYN W. COLVIN, <sup>1</sup> Acting	)	
Commissioner of Social Security.	)	(FIRST REQUEST)
	)	
Defendant.	)	
	)	

Plaintiff Jose E. Flores and Defendant Carolyn W. Colvin, Acting  
Commissioner of Social Security, through their undersigned attorneys, stipulate,  
subject to this court's approval, to extend the time by 30 days from August 29,  
2014 to September 26, 2014 for Plaintiff to file his Motion for Remand and/or

---

<sup>1</sup> Carolyn W. Colvin became the Acting Commissioner of Social Security on February 14, 2013. Pursuant to Rule 25(d)(1) of the Federal Rules of Civil Procedure, Carolyn W. Colvin should be substituted, therefore, for Commissioner Michael J. Astrue as Defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the

1 Reversal, with all other dates in the Court's Order Concerning Review Of Social  
2 Security Cases extended accordingly. This is Plaintiff's first request for an  
3 extension.

4 This request is made at the request of Plaintiff's counsel to allow additional  
5 time to fully research the issues presented.

6 DATE: August 29, 2014

Respectfully submitted,

7 ROHLFING & KALAGIAN, LLP

8 /s/ *Marc V. Kalagian*

9 BY: \_\_\_\_\_

Marc V. Kalagian

Attorney for plaintiff Mr. Jose E. Flores

12 DATE: August 29, 2014

13 DANIEL G. BOGDEN

United States Attorney

14 /s/ *Jean M. Turk*

15 BY: \_\_\_\_\_

Jean M. Turk

Assistant Regional Counsel

Attorneys for defendant Carolyn W. Colvin

17 |\*authorized by e-mail|

20 IT IS SO ORDERED: \_\_\_\_\_

21 *George Foley Jr.*  
UNITED STATES MAGISTRATE JUDGE

22 DATED: September 08, 2014

26 Social Security Act, 42 U.S.C. § 405(g). For simplicity, Plaintiff will refer to the  
Acting Commissioner as the Commissioner.